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5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

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7 UNITED STATES OF AMERICA,) Case No.: 2:17-mj-00163-PAL
8)
9 Plaintiff,)
10 vs.) STIPULATION TO CONTINUE
11) BENCH TRIAL
12) (First Request)
ANDREW LEON CHAVEZ,)
Defendant.)

13 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
14 Acting United States Attorney, and John Patrick Burns, Assistant United States Attorney, counsel
15 for the United States of America, and Martin Melendrez, Esquire, counsel for defendant, that the
16 bench trial in the above-captioned matter, currently scheduled for May 10, 2017, at the hour of
17 9:00 a.m., be vacated and continued for thirty (30) days or to a date and time convenient to the
18 Court.

19 This stipulation is entered into for the following reasons:

20 1. The parties are in the process of negotiating a resolution of the case that would
21 obviate the need for trial. The parties need additional time to do so.

22 2. Defendant is out of federal custody and agrees to the continuance.
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1 3. Denial of this request for a trial continuance would prejudice both the Defendants
2 and the Government and unnecessarily consume this Court's valuable resources, taking into
3 account the exercise of due diligence.

4 4. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice.

6 5. This is the first request for continuance of the trial in this case.

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8 DATED this day of May, 2017.

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10 Respectfully submitted,

11 STEVEN W. MYHRE
12 Acting United States Attorney

13 /s/ Martin Melendrez
14 MARTIN MELENDREZ, ESQ.
15 Counsel for defendant
16 **ANDREW LEON CHAVEZ**

17 /s/ John Patrick Burns
18 JOHN PATRICK BURNS
19 Assistant United States Attorney
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Defendant.

ORDER CONTINUING BENCH TRIAL

IT IS HEREBY ORDERED that the bench trial in the above-captioned matter currently scheduled for May 10, 2017, at the hour of 9:00 a.m., be vacated and continued to _____
June 14, 2017, at the hour of 9:00 a.m.

DATED this 9th day of May, 2017.

Tyzz A. Zeen
UNITED STATES MAGISTRATE JUDGE